

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

Civil Action No. 03 MDL 1570 (RCC)
ECF Case

This document relates to:

Estate of John P. O'Neill, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., 04-CV-1923
(RCC)

Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq, et al., 04-CV-1076
(RCC)

NOTICE OF PLAINTIFFS' CROSS MOTION

PLEASE TAKE NOTICE that upon the Memorandum of Law and Declaration of Gina M. MacNeill, Esquire attached hereto, Plaintiffs, by and through undersigned counsel, will move the Court, before the Honorable Richard C. Casey, at the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York, 10007, at a date and time to be determined by the Court, for an Order Striking Defendants' SCHREIBER & ZINDEL TREUHAND ANSALT, FRANK ZINDEL, ENGELBERT SCHREIBER, SR. AND ENGELBERT SCHREIBER, JR Supplemental Memorandum of Law of January 9, 2006, MDL Docket nos. 1591-2.

Dated: January 24, 2006

Respectfully submitted,

Jerry S. Goldman, Esquire (JG8445)
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